

United States District Court  
Eastern District of North Carolina – Eastern Division

North Carolina Environmental Justice  
Network, Neuse Riverkeeper Foundation,  
Inc., and Waterkeeper Alliance, Inc.

Plaintiffs,

v.

Mr. Donald Taylor and Ms. Annie Taylor,  
individually and d/b/a Taylor Finishing, Mr.  
Justin T. McLawhorn, and Mr. Aaron  
McLawhorn,

Defendants.

Civil Action No. 4:12-cv-00154

MOTION FOR LEAVE TO FILE A  
SECOND AMENDED COMPLAINT  
Fed. R. Civ. P. 15

Plaintiffs North Carolina Environmental Justice Network, Waterkeeper Alliance, Inc., and Neuse River Foundation, Inc., by and through their undersigned attorneys, and upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Leave to File a Second Amended Complaint, hereby move the Court pursuant to Fed. R. Civ. P. 15 for leave to file a Second Amended Complaint to add the McLawhorn Livestock Farm, Inc. as a defendant in the above-captioned action.

/s/ Michael T. Leigh

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### Certificate of Service

The undersigned hereby certifies that he is an attorney at law and is admitted to practice in the state of North Carolina, is attorney for plaintiffs, and is a person of such age and discretion as to be competent to serve process.

That on the 28th day of November he served a copy of the foregoing Motion for Leave to File a Second Amended Complaint via electronic filing through the Eastern District of North Carolina CM/ECF system, which will send notification of such filing to the following parties:

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